

Riccardo A. King II

FULL NAME

COMMITTED NAME (if different)

Coalinga State Hospital 24511 W. Jayne Avenue

FULL ADDRESS INCLUDING NAME OF INSTITUTION

Coalinga, CA. 93210-5000

DSAN0. 1693-1

PRISON NUMBER (if applicable)

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Riccardo A. King II

PLAINTIFF,

v.

California State Bar Court et al.

DEFENDANT(S).

CASE NUMBER

CV23-8239-HDV(MAA)

To be supplied by the Clerk

## CIVIL RIGHTS COMPLAINT

PURSUANT TO (Check one)

☒ 42 U.S.C. § 1983☐ Bivens v. Six Unknown Agents 403 U.S. 388 (1971)

## A. PREVIOUS LAWSUITS

1. Have you brought any other lawsuits in a federal court while a prisoner: ☐ Yes ☒ No
2. If your answer to "1." is yes, how many? \_\_\_\_\_

Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on an attached piece of paper using the same outline.)

- a. Parties to this previous lawsuit:  
Plaintiff \_\_\_\_\_

Defendants \_\_\_\_\_

- b. Court \_\_\_\_\_

- c. Docket or case number \_\_\_\_\_

- d. Name of judge to whom case was assigned \_\_\_\_\_

- e. Disposition (For example: Was the case dismissed? If so, what was the basis for dismissal? Was it appealed? Is it still pending?) \_\_\_\_\_

- f. Issues raised: \_\_\_\_\_

- g. Approximate date of filing lawsuit: \_\_\_\_\_

- h. Approximate date of disposition \_\_\_\_\_

## B. EXHAUSTION OF ADMINISTRATIVE REMEDIES

1. Is there a grievance procedure available at the institution where the events relating to your current complaint occurred? ☐ Yes ☒ No

2. Have you filed a grievance concerning the facts relating to your current complaint? ☐ Yes ☒ No

If your answer is no, explain why not There was too much police brutality to determine whether I could sue or file a grievance. They, as a punishment attempted to deny me options to file a grievance

3. Is the grievance procedure completed? ☐ Yes ☒ No

If your answer is no, explain why not I went to Fresno County Jail, away from my first institution and I filed a "petition of a writ of habeas corpus." No response.

4. Please attach copies of papers related to the grievance procedure.

## C. JURISDICTION

This complaint alleges that the civil rights of plaintiff \_\_\_\_\_

Riccardo A. King II

(print plaintiff's name)

who presently resides at Coalinga State Hospital, 2450 West Jayne Avenue, Coalinga CA 93210-5000,

(mailing address or place of confinement)

were violated by the actions of the defendant(s) named below, which actions were directed against plaintiff at

Los Angeles County Jail, Los Angeles, CA.

(institution/city where violation occurred)

on (date or dates) 7/3/2007, 8/2008, 8/2009  
(Claim I) (Claim II) (Claim III)

**NOTE:** You need not name more than one defendant or allege more than one claim. If you are naming more than five (5) defendants, make a copy of this page to provide the information for additional defendants.

1. Defendant Felipe B. Munoz resides or works at  
(full name of first defendant)  
California State Bar Los Angeles 845 S. Figueroa St LA, CA 90017-2515  
(full address of first defendant)  
Sergeant Munoz  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

We twisted and broke my arms and hit me in the face, Furthermore he and another deputy. Kicked and beat me in my jail cell, several times.

2. Defendant Leslie Warren Attorney, Public Defenders Office resides or works at  
(full name of first defendant)  
845 S. Figueroa St. Los Angeles, CA 90017-2515  
(full address of first defendant)  
Public Defender.  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

Leslie Warren, pled "no contest" for me in court and I was not present to make such a plea. I stayed 5 1/2 years at LACJ Jail as a result of this mishandling.

3. Defendant Deputy Starovsky resides or works at  
(full name of first defendant)  
845 S. Figueroa St, Los Angeles, CA 90017-2515  
(full address of first defendant)  
Deputy Starovsky  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

He assisted Sergeant Munoz in beating me, and denied me dinner at chow times on more than a couple of occasions. And gave me less than quality treatment at the LACJ Jail

4. Defendant Deputy Estrada resides or works at  
(full name of first defendant)  
California State Bar Court Los Angeles 845 S. Figueroa St. LA CA 90017-2515  
(full address of first defendant)  
Deputy Estrada  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

Assisted beating on me, and giving no respect to my rights. I couldn't  
ask him questions and they were inhospitable to me and my questions.

5. Defendant Deputy Cheng resides or works at  
(full name of first defendant)  
California State Bar Court 845 S. Figueroa Street, LA, CA 90017-2515  
(full address of first defendant)  
Deputy Cheng  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law:

Deputy Cheng pulled my arms through the tray slot in administrative  
segregation, with the handcuffs attached to a chain and kept me with  
scars.



## D. CLAIMS\*

## CLAIM I

The following civil right has been violated:

Having needs on time, that is for dinner, that it was actually given to me on some days, and some days, not. They were very hostile to ~~from~~ me, and they acted like they wanted money from my bank account. They pursued with hostile treatment. They beat on me 50 times during the 5 1/2 years I was there at LA County Jail. Felipe E. Munoz, the sergeant, was preoccupied with raping the female deputies and left me scars as a connection with the abuses, because I tried to stand up against his mistreatment of others in the jail. I was also shot with live ammunition that they brought in the jail. I was also cut in the throat and seared to death with searings of my fingers and toes. ~~Deputy~~ <sup>Deputy</sup> Munoz even cut my arms and legs and shot me in my head. I saw subliminal effects of the treatment that brought me to hellish hallucinations. Additionally, I was roped by the sheriff and nearly died from the hanging.

Supporting Facts: Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be certain you describe, in separately numbered paragraphs, exactly what each DEFENDANT (by name) did to violate your right.

1. Felipe E. Munoz seared my feet and hands, and shot me with a gun, nearly taking my life. I got shot numerous times <sup>with</sup> live ammunition.
2. There were millions of knots in the room and a result of the beatings. I killed the knots because they were disturbing to my life.
3. Deputy Sterovinsky got on top of me and so did Munoz. Munoz was over 450 pounds and they found times to beat and kick me while I was in my jail cell. This amounted with various deputies 50 beatings approximately in total.
4. Deputy Cheng pulled my arms through the tray slot and injured me seriously, leaving marks on my arms and my wrists.
5. Deputy Estrada, and deputy Rivera continued with the erasiveness to my request for help, and I have been afraid to tell people because, I know they would assault me for telling on them.
6. Other deputies involved are "Hudson", "Rivera", "Lopez", "Colin", "Haro" and "Ugarte".

\*If there is more than one claim, describe the additional claim(s) on another attached piece of paper using the same outline.

To. Leslie Warren, my attorney at the time. I believe because of the violation of my civil ~~rights~~ rights, entered a plea of "no contest" for me, and I was not brought in to arraignment court to make a plea. I would not have pled "no contest", I would've pled "not guilty". I believe that this is a blanket violation of my civil rights.

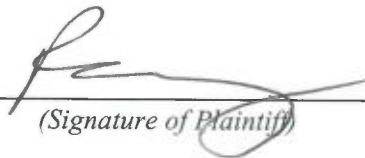
**E. REQUEST FOR RELIEF**

I believe that I am entitled to the following specific relief:

1. I feel that I should have an opportunity to change the "no contest" plea against me because I wasn't available to make a plea. The police beat me so much that she must've gotten afraid for my life and entered a plea in my absence.
2. I feel that I should be released on my own recognizance because of the harsh treatment. I'm afraid if I ~~go~~ go back to the "old ad-seg" administrative segregation, that they'll beat on me again.
3. I should have a bail amount available to me, for the original charge.
4. That with all evidence in hand, the police should be disciplined for their misconduct.

2/1/2024

(Date)



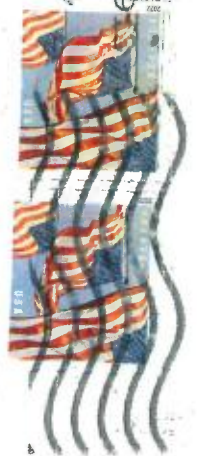
(Signature of Plaintiff)

Ricardo A. King II  
DS# NO. 1693-1  
DS# A. Carlings  
24511 W. Joyce Avenue  
Carlsbad, CA 92015-5503  
Case # 2:23-cv-8239 Doc # 12

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Continue Reply Clerk to Magistrate Maria A. Anderson  
Edward R. Royal Federal Building & US Courthouse  
255 E. Temple Street, Los Angeles, CA 90012.





